

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MAINE**

**PEACE OF MIND OPPORTUNITY SERVICES,)
INC., a Maine corporation)**

Plaintiff)

V.)

**CURT LEFEBVRE and JEFFREY)
HENTHORN, individuals and residents of the)
State of Maine)**

Defendants)

Civil Action No.)

**VERIFIED COMPLAINT
JURY TRIAL DEMAND**

Plaintiff Peace of Mind Opportunity Services, Inc., by and through its undersigned attorneys, David J. Van Dyke Esq., Lynch & Van Dyke P.A., Lewiston, Maine, hereby files suit against the above-captioned Defendants Curt Lefebvre and Jeffrey Henthorn, and in support thereof, states as follows.

JURISDICTION AND VENUE

1. This Court has jurisdiction over this action against the Defendants pursuant to 42 U.S.C. §1983 as well as 28 U.S.C. § 1331.
2. Venue is properly vested in this Court because Plaintiff and the Defendants are residents of this District and the acts complained of occurred within the jurisdiction of this District (specifically, Waldo County, Maine).

PARTIES

3. Plaintiff Peace of Mind Opportunity Services, Inc. (POM) is a minority (female) owned and managed business company, organized and existing under and by virtue of the laws of the State of Maine, with a principal place of business in Dover-Foxcroft, Maine. Both POM's principals, and its minority owner, are women. POM is owned principally by Karen McCue, Dover-Foxcroft, Maine.
4. Defendant Curt Lefebvre is an individual and, upon information and belief, a resident of the State of Maine. At all times relevant hereto, Defendant Lefebvre was acting and has acted under color of and by virtue of his position as Facilities Engineer for the State of Maine Judicial Department.
5. Defendant Jeffrey Henthorn is an individual and, upon information and belief, a resident of the State of Maine. At all times relevant hereto, Defendant Henthorn was acting and has acted under color of and by virtue of his position as Director of Court Facilities for the State of Maine Judicial Department, Administrative Office of the Courts.

UNDERLYING FACTS

6. Female-owned and operated POM is in the business *inter alia*, of providing cleaning and property maintenance services to state (Maine) agencies, including the Maine Judicial Department.
7. At times relevant, POM held a contract for cleaning and property maintenance services at the Maine District Court facility in Belfast, Waldo County, Maine (the "subject Contract").

8. On or about October 23, 2017, the subject Contract was terminated by the actions of Defendants.

COUNT I
VIOLATION OF CIVIL RIGHTS

9. Plaintiff POM incorporates by reference all of the above paragraphs as if set forth fully herein.
10. In its termination of POM, Defendants acted pursuant to a false and fraudulent pretext, in a disparate and adverse fashion towards POM than it had other, non-female owned and operated businesses, because POM is and was a female owned and operated business.
11. At no time did Defendants have any good-faith or appropriate basis for the termination of POM.
12. Specifically, Defendants terminated POM because a female manager of POM had not responded to inappropriate sexual overtures and/or because of an objective animus on the part of Defendant Lefebvre towards women as manifest by gender-based harassment, inappropriate sexual and gender-directed comments and bullying.
13. Accordingly, Defendants have violated the civil rights of POM by acting in the aforesaid disparate, wrongful and illegal fashion under color of state authority.
14. Defendants Lefebvre and/or Henthorn have acted with malice towards POM or, alternatively, the actions of Lefebvre and/or Henthorn have been of such an egregious and outrageous character and nature that malice can be inferred therefrom or malice is implied therein.

**STATE OF MAINE
PISCATAQUIS, SS.**

January __, 2018

Personally appeared the above-named Karen McCue, to me personally known, and made oath that the allegations in the foregoing Verified Complaint are true and correct to the best of her knowledge and belief.

Before me,

/s/

Notary Public

My Commission Expires: